

WEIL, GOTSHAL & MANGES LLP

Stephen Karotkin (*pro hac vice*)
(stephen.karotkin@weil.com)
Ray C. Schrock, P.C. (*pro hac vice*)
(ray.schrock@weil.com)
Jessica Liou (*pro hac vice*)
(jessica.liou@weil.com)
Matthew Goren (*pro hac vice*)
(matthew.goren@weil.com)
New York, NY 10153-0119
Tel: (212) 310-8000
Fax: (212) 310-8007

KELLER BENVENUTTI KIM LLP

Tobias S. Keller (#151445)
(tkeller@kbbkllp.com)
Jane Kim (#298192)
(jkim@kbbkllp.com)
650 California Street, Suite 1900
San Francisco, CA 94108
Tel: (415) 496-6723
Fax: (415) 636-9251

Attorneys for Debtors and Debtors in Possession

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION,

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas and Electric Company
☒ Affects both Debtors

** All papers shall be filed in the lead case,
No. 19-30088 (DM)*

Bankruptcy Case No. 19-30088 (DM)

Chapter 11

(Lead Case) (Jointly Administered)

**SECOND STIPULATION BETWEEN THE
DEBTORS AND CALIFORNIA SELF-
INSURERS' SECURITY FUND
EXTENDING TIME TO FILE
OBJECTION TO PLAN**

[No Hearing Requested]

1 This stipulation and agreement for order (“**Stipulation and Agreement for Order**”) is
2 entered into by PG&E Corporation and Pacific Gas and Electric Company, as debtors and
3 debtors in possession (collectively, the “**Debtors**”) in the above-captioned chapter 11 cases (the
4 “**Chapter 11 Cases**”), and the California Self-Insurers’ Security Fund (“**CSISF**”). The Debtors
5 and CSISF are referred to in this Stipulation and Agreement for Order collectively as the
6 “**Parties**,” and each as a “**Party**.” The Parties hereby stipulate and agree as follows:

7 **RECITALS**

8 A. On March 17, 2020, the United States Bankruptcy Court for the Northern District
9 of California (the “**Bankruptcy Court**”) entered an Order (the “**Solicitation Procedures**
10 **Order**”) that, among other things, approved the disclosure statement for the *Debtors’ and*
11 *Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Under Chapter 11 of the*
12 *Bankruptcy Code* (as may be amended, modified, or supplemented from time to time, and
13 together with all exhibits and schedules thereto, the “**Plan**”). In accordance with the Solicitation
14 Procedures Order, the Debtors commenced solicitation of their Plan on or about March 30, 2020,
15 and the hearing to consider confirmation of the Plan is scheduled for May 27, 2020.

16 B. The Solicitation Procedures Order, among other things, established the deadline to
17 file objections to confirmation of the Plan (an “**Objection**”), at 4:00 p.m. (Prevailing Pacific
18 Time) on May 15, 2020 (the “**Objection Deadline**”).

19 C. On May 15, 2020, the Parties entered into a stipulation whereby the time for
20 CSISF to file and serve an Objection to the Plan was extended through 1:00 p.m. (Prevailing
21 Pacific Time) on May 18, 2020.

22 D. Counsel for CSISF has requested, and counsel for the Debtors has agreed, to
23 further extend the Objection Deadline for CSISF to file an Objection to the Plan as set forth
24 herein.

25 **NOW, THEREFORE, UPON THE FOREGOING RECITALS, WHICH ARE**
26 **INCORPORATED AS THOUGH FULLY SET FORTH HEREIN, IT HEREBY IS**
27 **STIPULATED AND AGREED, BY AND BETWEEN THE PARTIES, THROUGH THE**
28 **UNDERSIGNED, AND THE PARTIES JOINTLY REQUEST THE COURT TO ORDER,**
THAT:

1 1. The time for CSISF to file and serve an Objection to the Plan is further extended
2 through 1:00 p.m. (Prevailing Pacific Time) on May 20, 2020.

3 2. This Stipulation shall constitute the entire agreement and understanding of the
4 parties relating to the subject matter hereof and shall supersede all prior agreements and
5 understandings relating to the subject matter hereof.

6 3. This Stipulation may be executed in counterparts, each of which shall be deemed
7 an original but all of which together shall constitute one and the same agreement.

8 4. The Bankruptcy Court shall retain jurisdiction to resolve any disputes or
9 controversies arising from this Stipulation.

11 Dated: May 18, 2020

 Dated: May 18, 2020

12 WEIL, GOTSHAL & MANGES LLP
13 KELLER BENVENUTTI KIM LLP

 NIXON PEABODY LLP

14 /s/ Matthew Goren
15 Matthew Goren

/s/ Richard C. Pedone
 Richard C. Pedone

16 *Attorneys for Debtors*
17 *and Debtors in Possession*

Attorneys for California Self-Insurers'
 Security Fund